

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:2024-CR-80110-Singhal/Maynard

UNITED STATES OF AMERICA

v.

PATRICIA CORNELIUS,  
a/k/a "Patricia Hilton,"  
a/k/a "Patricia Eloise,"  
a/k/a "Sharon Tash Williams,"  
a/k/a "Donna Cornelius,"

Defendant.

**FACTUAL BASIS IN SUPPORT OF GUILTY PLEA**

The United States of America and PATRICIA CORNELIUS ("the Defendant") agree that had this matter proceeded to trial, the United States would have proven the following elements and facts beyond a reasonable doubt:

**Count 1 Elements – False Statement in a Passport Application, 18 U.S.C. § 1542**

- (1) the Defendant made a false statement in an application for a United States passport;
- (2) the Defendant made the statement intending to get a United States passport for her own use; and
- (3) the Defendant acted knowingly and willfully.

**Facts**

1. On or about August 1, 2023, the Defendant applied for a passport in person at the Boca Raton Downtown Post Office location in Palm Beach County, Florida. The Defendant stated in this application that she was born in St. John's County, Florida as "Patricia Hilton." This statement was false, in that the Defendant was not born in St. John's County, Florida.

2. In support of the statement outlined in paragraph 1 above, the Defendant included a purported birth certificate of "Patricia Hilton" from St. John's County, Florida in her passport application. The Florida Department of Health, Bureau of Vital Statistics certified that there is no such birth record on file for "Patricia Hilton."

2. The Defendant made the statement outlined above in paragraph 1 with the intent to obtain a U.S. passport for her own use. The U.S. passport application was for herself. The Defendant also followed up on her passport application and provided reasons why she needed the passport for herself.

3. The Defendant made the false statement outlined above in paragraph 1 knowingly and willfully.

4. All events occurring in the Southern District of Florida.

MICHAEL S. DAVIS  
ACTING UNITED STATES ATTORNEY

Date: 1/21/25

By:

  
JUSTIN CHAPMAN  
ASSISTANT UNITED STATES ATTORNEY


Date: 1/21/25

By:

  
~~CHARLES FOUNTAIN~~ Robert David Malore  
ATTORNEY FOR DEFENDANT

Date: 1-24-25  
OKR

By:

  
PATRICIA CORNELIUS  
DEFENDANT